

Michael Tenenbaum, Esq. (No. 186850)  
*mt@post.harvard.edu*  
THE OFFICE OF MICHAEL TENENBAUM, ESQ.  
1431 Ocean Ave., Ste. 400  
Santa Monica, CA 90401  
Tel (424) 246-8685  
Fax (424) 203-4285

*Counsel for Plaintiff International Fur Trade Federation*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

INTERNATIONAL FUR TRADE  
FEDERATION, an unincorporated  
association;

Plaintiff,

– against –

CITY AND COUNTY OF SAN  
FRANCISCO; and

DR. GRANT COLFAX, an individual, in  
his official capacity as Director of the  
San Francisco Department of Public  
Health;

Defendants.

Case No. 3:20-cv-00242-RS

**DECLARATION OF PAUL  
STOCKALL IN SUPPORT OF  
PLAINTIFF’S MOTION FOR  
SUMMARY JUDGMENT**

Date: July 2, 2020

Time: 1:30 p.m.

Courtroom: 3

Hon. Richard Seeborg

1 I, Paul Stockall, declare as follows:

2 1. I am the Director of Standards and Sustainability for the International Fur  
3 Trade Federation (“IFF”), the plaintiff in this action. IFF, established in 1949,  
4 represents the international fur industry and regulates its practices and trade. IFF  
5 promotes the business of fur by establishing certification and traceability programs on  
6 animal welfare and the environment. IFF represents 56 members associations in over  
7 40 countries around the world, including the Fur Commission USA. The members  
8 encompass all parts of the fur trade, including farmers, trappers, auction houses,  
9 brokers, dressers, designers, manufacturers, and retailers.

10 2. Each of IFF’s members have signed a strict code of conduct committing  
11 them to upholding the industry-relevant laws they fall under in their home countries,  
12 including laws relating to animal welfare, environmental standards, employment,  
13 antitrust, bribery, and corruption, and international conventions, including the  
14 Convention on International Trade in Endangered Species, also known as CITES or the  
15 Washington Convention of 1975.

16 3. For example, Europe’s fur sector, which produces approximately 50% of  
17 all fur globally, voluntarily initiated the launch of the science-based welfare assessment  
18 program WelFur in 2009. WelFur is a welfare assessment program developed by  
19 independent scientists at seven European universities, who produced welfare  
20 assessment protocols for fur farmed species. The protocols serve as “manuals” for third  
21 parties by providing guidelines on how to assess the performance of fur farms  
22 concerning animal welfare. WelFur’s aim is to measure animal welfare at the fur farms  
23 by setting 12 welfare criteria based on scientific research. These criteria reflect the four  
24 welfare principles established by the European Commission: Good Housing, Good  
25 Feeding, Good Health and Appropriate Behavior.

26 4. WelFur’s protocols are available at [https://www.sustainablefur.com/wp-](https://www.sustainablefur.com/wp-content/uploads/2018/11/Mink_protocol_final_web_edition_light.pdf)  
27 [content/uploads/2018/11/Mink\\_protocol\\_final\\_web\\_edition\\_light.pdf](https://www.sustainablefur.com/wp-content/uploads/2018/11/Mink_protocol_final_web_edition_light.pdf) and  
28 [https://www.sustainablefur.com/wp-content/uploads/2018/11/WelFur\\_fox\\_protocol](https://www.sustainablefur.com/wp-content/uploads/2018/11/WelFur_fox_protocol)

1 [web edition.pdf](#). Certification assessments are performed by third-party auditors such  
2 as Baltic Control. The WelFur certification covers more than 23 countries across  
3 Europe and North America. Indeed, of the approximately 3,000 fur farms operating in  
4 Europe, 97% are certified under WelFur. And WelFur applies to all European mink,  
5 fox, and Finnraccoon. The WelFur program accounts for approximately 80% of global  
6 farmed mink.

7       5. Likewise, over 90% of U.S. mink comes from farms certified under the  
8 “Standard Guidelines for the Operation of Mink Farms.” This certification program  
9 was among the first of its kind and was begun by IFF-member the Fur Commission  
10 USA, the national trade association of the U.S. mink producers. The certified farms  
11 undergo regular and mandatory veterinary inspections by accredited U.S. Department of  
12 Agriculture veterinarians.

13       6. In addition to WelFur, IFF utilizes the FurMark program and traceability  
14 and certification label, which is a global certification program that overarches WelFur  
15 as well as programs governing dressers and dyers, wild fur, and North American mink  
16 certification. FurMark certification imposes strict compliance with the Safe Fur  
17 Standard, which regulates the chemicals that dressers and dyers of fur may use in  
18 processing. The chemicals used in such processing may include chromium III (not  
19 chromium VI), which is not toxic and is extremely common. In addition,  
20 formaldehyde, another common chemical found in many products, may be used as a  
21 preservative, although it is not necessary and is no longer used in Europe or North  
22 America in dressing furs.

23       7. Certification pursuant to WelFur, FurMark, the Fur Commission USA’s  
24 “Standard Guidelines for the Operation of Mink Farms in the United States,” or another  
25 of the existing certification programs is incentivized by the fur industry’s auction  
26 houses, such as SAGA Furs, located in Finland, and Copenhagen Fur, located in  
27 Denmark, as the auction houses have committed to selling only pelts sourced from  
28 certified farms.

1        8. Wild fur is also subject to strict international, national, and regional  
2 regulations regarding licensing, quotas, and ecosystem management. Modern trapping  
3 methods have been refined by decades of scientific research and must comply with the  
4 Agreement on International Humane Trapping Standards (among Canada, the European  
5 Union, and the Russian Federation) and with an Agreed Minute between the European  
6 Community and the United States of America on Humane Trapping Standards.

7        9. The fur industry, including farmed and wild fur, is conducted in a manner  
8 that contributes to the environmental sustainability of our communities. Fur trapping is  
9 a necessary part of ecosystem management, and farmed fur animals are fed left-overs  
10 from human food-production that would otherwise have gone into landfills. Farmed fur  
11 animals recycle this “waste” from our food-production system into a long-lasting and  
12 ultimately biodegradable clothing material, while their manure, carcasses, and soiled  
13 straw bedding are used to produce biofuels or organic fertilizers, completing the  
14 nutrient cycle.

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1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct.

3 Dated: May 15, 2020



4 Paul Stockall